

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (Akron)**

In re:

SEPCO CORPORATION,

Debtor.¹

Chapter 11

Case No. 16-50058

Judge Alan M. Koschik

**FIRST INTERIM APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR,
LLP FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF
EXPENSES FOR PROFESSIONAL SERVICES RENDERED AS COUNSEL TO
LAWRENCE FITZPATRICK, LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS
FOR THE PERIOD FROM JULY 18, 2017 THROUGH NOVEMBER 30, 2017²**

Name of Applicant:	Young Conaway Stargatt & Taylor, LLP
Authorized to Provide Professional Services to:	Lawrence Fitzpatrick, Legal Representative for Future Claimants
Date of Retention:	October 4, 2017, effective <i>nunc pro tunc</i> to July 18, 2017 [Docket No. 287]
Period for which compensation and Reimbursement is sought:	July 18, 2017 through November 30, 2017
Amount of Compensation Sought as Actual, Reasonable and Necessary:	\$29,204.00
Amount of Expense Reimbursement Sought as Actual, Reasonable and Necessary:	\$406.93
This is an:	<input checked="" type="checkbox"/> interim <input type="checkbox"/> final application

¹ The last four digits of the Debtor's federal tax identification number are 7402.

² The *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants' Representative* was entered on October 4, 2017 (see D.I. 287) but was *nunc pro tunc* to July 18, 2017. Since the deadline to file interim fee applications covering the period June 1, 2017 – August 31, 2017 was on or around September 20, 2017, this is the first interim application of Young Conaway Stargatt & Taylor ("YCST"). YCST's next interim application will be filed in accordance with the *Agreed Order Granting Motion for an Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professionals Pursuant to Section 105(a) and 331 of the Bankruptcy Code* (the "Interim Compensation Order") which was entered on September 2, 2016 (see D.I. 149) and will cover December 1, 2017 – February 28, 2018.

SUMMARY OF PRIOR INTERIM FEE APPLICATIONS

<u>Date Filed; Docket No.</u>	<u>Period Covered</u>	<u>Requested Fees/Expenses</u>	<u>Order Approving Interim Application</u>	<u>Amount Approved and/or Paid</u>
n/a	n/a	n/a	n/a	n/a

This is the first interim fee application of Young Conaway Stargatt & Taylor, LLP. No prior applications have been filed.

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (Akron)**

In re:

SEPCO CORPORATION,

Debtor.¹

Chapter 11

Case No. 16-50058

Judge Alan M. Koschik

**FIRST INTERIM APPLICATION OF YOUNG CONAWAY STARGATT & TAYLOR, LLP
FOR ALLOWANCE OF COMPENSATION AND REIMBURSEMENT OF EXPENSES
FOR PROFESSIONAL SERVICES RENDERED AS COUNSEL TO LAWRENCE
FITZPATRICK, LEGAL REPRESENTATIVE FOR FUTURE CLAIMANTS
FOR THE PERIOD FROM JULY 18, 2017 THROUGH NOVEMBER 30, 2017²**

Young Conaway Stargatt & Taylor, LLP (“YCST” or the “Applicant”), counsel to Lawrence Fitzpatrick, the legal representative for future claimants (the “Future Claimants’ Representative” or the “FCR”) in the chapter 11 case commenced by Sepco Corporation (“Sepco” or the “Debtor”), files this First Interim Application (the “Application”) of Young Conaway Stargatt & Taylor, LLP for Allowance of Compensation and Reimbursement of Expenses for Professional Services Rendered as Counsel to Lawrence Fitzpatrick, Legal Representative for Future Claimants for the Period July 18, 2017 through November 30, 2017³ (the “Interim Period”), pursuant to sections 330 and 331 of title 11 of the United States Code, 11 U.S.C. §§ 101 *et seq.* (the “Bankruptcy Code”), Rule 2016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), and this Court’s *Agreed Order Granting Motion for an*

¹ The last four digits of the Debtor’s federal tax identification number are 7402.

² The *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants’ Representative* was entered on October 4, 2017 (see D.I. 287) but was *nunc pro tunc* to July 18, 2017. Since the deadline to file interim fee applications covering the period June 1, 2017 – August 31, 2017 was on or around September 20, 2017, this is the first interim application of Young Conaway Stargatt & Taylor (“YCST”). YCST’s next interim application will be filed in accordance with the *Agreed Order Granting Motion for an Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professionals Pursuant to Section 105(a) and 331 of the Bankruptcy Code* (the “Interim Compensation Order”) which was entered on September 2, 2016 (see D.I. 149) and will cover December 1, 2017 – February 28, 2018.

³ See Footnote 2.

Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professional Pursuant to Section 105(a) and 331 of the Bankruptcy Code (the “Interim Compensation Order”) entered September 2, 2016 [Docket No. 149].

By this Application, YCST hereby moves this Court for an order awarding the Applicant reasonable compensation for the Interim Period for professional legal services rendered in the amount of \$29,204.00 and reimbursement for actual and necessary expenses incurred in the amount of \$406.93, for a total of \$29,610.93. In support of this Application, YCST states as follows:

JURISDICTION AND STATUTORY BASIS FOR RELIEF

1. The Court has jurisdiction over the Application pursuant to 28 U.S.C. §§ 157 and 1334. Venue is proper in this district pursuant to 28 U.S.C. §§ 1408 and 1409.
2. This is a core proceeding pursuant to 28 U.S.C. § 157(b)(2). The statutory basis for the relief requested herein is §§ 105(a) 330, 331, 503(b)(2), and 507(a)(2) of the Bankruptcy Code.

BACKGROUND

3. On January 14, 2016 (the “Petition Date”), the Debtor filed a voluntary petition in this Court for relief under chapter 11 of the Bankruptcy Code.
4. From the Petition Date through the date of this First Interim Application, the Debtor has continued to operate its business and manage its property as a debtor-in-possession, pursuant to sections 1107(a) and 1108 of the Bankruptcy Code.
5. On September 13, 2017, Lawrence Fitzpatrick filed and served his *Application for Order Authorizing the Future Claimants’ Representative to Retain and Employ Young Conaway*

Stargatt & Taylor, LLP as His Attorneys Nunc Pro Tunc to July 18, 2017 [Docket No. 267]. On October 4, 2017, the Court entered the *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants' Representative* (the “Retention Order”) [Docket No. 287].

RELIEF REQUESTED

6. By this First Interim Application, the Applicant seeks interim allowance of \$29,204.00 in fees for services rendered during the Interim Period and reimbursement of \$406.93 for reasonable and necessary expenses incurred during the Interim Period, for a total of \$29,610.93.

7. The Applicant has received no promises for payment from any third party for services rendered during the Interim Period in connection with the case. There exists no agreement or understanding between Applicant and any other person for the sharing of any compensation to be received for services rendered by the Applicant in the case.

8. All services for which compensation is requested by the Applicant pursuant to this Application were performed for or on behalf of the FCR in this case.

SUMMARY OF SERVICES RENDERED AND EXPENSES INCURRED

9. During the Interim Period, the Applicant spent 57.70 hours of attorney and paralegal time in connection with this case resulting in fees totaling \$29,204.00. Attached hereto as **Exhibits A-1 through A-3** are detailed descriptions of the services performed and expenses incurred by YCST during the Interim Period.

10. The Applicant has divided the services provided into the following categories: (a) Case Administration; (b) Court Hearings; (c) Use, Sale or Lease of Property (363 issues); (d) Other Adversary Proceedings; (e) Plan and Disclosure Statement; (f) Asset Analysis; (g)

Retention of Professionals/Fee Issues; (h) Fee Application Preparation and (i) Travel. These categories are more fully described and discussed below. The following is a summary of services that the Applicant performed during the Interim Period:

- (a) *Case Administration (Task Code B001)* – During the Interim Period, the Applicant spent time downloading and circulating to the FCR and his counsel recently filed pleadings from the Court docket to keep them informed of case developments. Time was also spent conferring with the client and other professionals regarding due diligence issues and case status. The Applicant expended 1.90 hours totaling \$675.50 in fees for this category of services rendered.
- (b) *Court Hearings (Task Code B002)* – During the Interim Period, the Applicant spent time participating in a telephonic hearing and status conference on November 7, 2017. The Applicant expended 1.00 hours totaling \$704.00 in fees for this category of services rendered.
- (c) *Use, Sale or Lease of Property (363 issues)* – During the Interim Period, the Applicant spent time reviewing and analyzing the draft motion to approve the Hartford settlement agreement and corresponding with other professionals on this matter. The Applicant expended 3.90 hours totaling \$2,350.00 in fees for this category of services rendered.
- (d) *Other Adversary Proceedings (Task Code B011)* – During the Interim Period, the Applicant spent time reviewing, analyzing, and commenting on proposed revisions to the protective order to include the FCR within the scope of the order and a motion to approve those changes. The Applicant expended 2.20 hours totaling \$1,189.50 in fees for this category of services rendered.
- (e) *Plan and Disclosure Statement (Task Code B012)* – During the Interim Period, the Applicant spent time working and corresponding with other professionals regarding plan

negotiations. The Applicant expended 2.20 hours totaling \$1,751.00 in fees for this category of services rendered.

(f) *Asset Analysis (Task Code B016)* – During the Interim Period, the Applicant spent time reviewing and analyzing insurance issues and reviewing and commenting on the proposed Harford Settlement agreement and a draft motion seeking court approval of that agreement. Additional time was spent reviewing the draft motion to establish a Qualified Settlement Fund to hold the proceeds of that settlement agreement. The Applicant expended 8.90 hours totaling \$4,338.50 in fees for this category of services rendered.

(g) *Retention of Professionals/Fee Issues (Task Code B017)* – During the Interim Period, the Applicant spent time attending to issues regarding the appointment of the FCR, the FCR’s insurance coverage, and preparing and executing YCST’s retention application. The Applicant expended 31.80 hours totaling \$15,592.00 in fees for this category of services rendered.

(h) *Fee Application Preparation (Task Code B018)* – During the Interim Period, the Applicant spent time reviewing and revising fee statements and drafting the first interim fee application. The Applicant expended 4.30 hours totaling \$1,373.50 in fees for this category of services rendered.

(i) *Travel (Task Code B019)* – During the Interim Period, the Applicant traveled to and from Washington, DC to attend a meeting with Committee counsel regarding the Debtor’s asbestos insurance and Plan formulation. Time expended in this category was billed at half the normal rate. The Applicant expended 1.50 hours totaling \$1,230.00 in fees for this category of services rendered.

11. As set forth above, the Applicant spent a total of 57.70 hours and incurred fees of \$29,204.00 for the services provided during the Interim Period. A Cumulative Compensation Summary by project category and Cumulative Expense summary are set forth and attached as

Exhibit B. The totals by attorney and paralegal are as follows:

<u>Professional</u>	<u>Current Hourly Billing Rate</u>	<u>Total Billed Hours for the Period</u>	<u>Total Compensation for the Period</u>	<u>Total Billed Hours from the Petition Date</u>	<u>Total Compensation from the Petition Date</u>
Edwin J. Harron, Partner	\$820.00	9.60	\$7,872.00	9.60	\$7,872.00
Sharon M. Zieg, Partner	\$695.00	1.60	\$1,112.00	1.60	\$1,112.00
Sara Beth A.R. Kohut, Counsel	\$555.00	29.10	\$15,873.00	29.10	\$15,873.00
Jordan E. Sazant, Associate	\$285.00	3.80	\$1,083.00	3.80	\$1,083.00
Casey Cathcart, Paralegal	\$240.00	8.80	\$2,112.00	8.80	\$2,112.00
Lisa Eden, Paralegal	\$240.00	4.80	\$1,152.00	4.80	\$1,152.00
TOTAL		57.70	\$29,204.00	57.70	\$29,204.00

12. YCST requests reimbursement as follows for its actual and necessary expenses incurred during the Interim Period totaling \$406.93:

<u>Expense Category</u>	<u>Total Expenses for the Period</u>	<u>Total Expenses from the Petition Date</u>
Air/Rail Travel	\$267.00	\$267.00
Car/Bus/Subway Travel	\$35.87	\$35.87
Certified Court Documents	\$0.00	\$0.00
Computerized Legal Research	\$0.00	\$0.00
Docket Retrieval/Search	\$47.50	\$47.50
Federal Express	\$15.26	\$15.26
Hotel/Lodging	\$0.00	\$0.00
Miscellaneous	\$0.00	\$0.00
Mileage	\$0.00	\$0.00
Parking	\$11.00	\$11.00

Postage	\$8.20	\$8.20
Reproduction Charges	\$22.10	\$22.10
Teleconference / Video Conference	\$0.00	\$0.00
Travel Meals	\$0.00	\$0.00
Working Meals	\$0.00	\$0.00
TOTAL	\$406.93	\$406.93

Attached hereto as **Exhibits C-1 through C-3** are a copy of the Applicant's expenses, as well as all receipts for reimbursement of expenditures exceeding \$25.00.

LEGAL STANDARD FOR AWARDING COMPENSATION

13. Under section 330(a)(1) of the Bankruptcy Code, the Court may award reasonable compensation for actual, necessary services rendered by professionals employed by the Committee, including attorneys and paralegals employed by such attorneys based on the nature, extent, and value of the services rendered; time spent on such services; and the cost of comparable services other than in a bankruptcy case. The Court may also award reimbursement for actual, necessary expenses. *Id.*

14. Section 330(a)(3) of the Bankruptcy Code provides:

In determining the amount of reasonable compensation to be awarded to an examiner, trustee under chapter 11, or professional person, the court shall consider the nature, the extent, and the value of such services, taking into account all relevant factors, including—

- (A) the time spent on such services;
- (B) the rates charged for such services;
- (C) whether the services were necessary to the administration of, or beneficial at the time at which the service was rendered toward the completion of, a case under this title;
- (D) whether the services were performed within a reasonable amount of time commensurate with the complexity, importance, and nature of the problem, issue, or task addressed;

(E) with respect to a professional person, whether the person is board certified or otherwise has demonstrated skill and experience in the bankruptcy field; and

(F) whether the compensation is reasonable based on the customary compensation charged by comparably skilled practitioners in cases other than cases under this title

15. The Applicant has endeavored to represent the FCR in the most expeditious and economical manner possible. Further, the professionals at YCST have coordinated their activities with co-counsel to avoid duplication of effort on behalf of the FCR in the case whenever possible.

CONCLUSION

16. As previously stated, no agreement or understanding exists between the Applicant and any other person for sharing of any compensation to be received for professional services rendered or to be rendered in connection with this case.

17. No prior application has been made in this or any other Court for the relief requested herein for the interim period of July 18, 2017 through November 30, 2017⁴.

18. The Certification of Edwin J. Harron is attached hereto as **Exhibit D**.

Continued on Next Page

⁴ See Footnote 2.

WHEREFORE, for the reasons set forth herein, YCST respectfully requests: (i) interim allowance of compensation in the amount of \$29,204.00 for professional services rendered and \$406.93 as reimbursement for actual and necessary expenses YCST incurred during the First Interim Fee Period pursuant to Section 330 of the Bankruptcy Code; (ii) that the allowance of such compensation be without prejudice to YCST's right to seek additional compensation for services rendered and expenses incurred during the First Interim Fee Period that were not processed at the time of this Application; and (iii) that the Court grant such other and further relief as is just and proper.

Dated: December 21, 2017

BLACK, McCUSKEY, SOUERS & ARBAUGH, LPA

/s/ Joel K. Dayton

Joel K. Dayton (#0015804)
220 Market Avenue South, Suite 1000
Canton, OH 44702
Telephone: 330-456-8341
Facsimile: 330-456-5756
Email: jdayton@bmsa.com

- and -

Edwin J. Harron (Delaware Bar No. 3396)
Sara Beth A.R. Kohut (Delaware Bar No. 4137)
YOUNG CONAWAY STARGATT & TAYLOR, LLP
Rodney Square
1000 North King Street
Wilmington, Delaware 19801
Telephone: (302) 571-6600
Facsimile: (302) 571-1253
Email: eharron @ycst.com
skohut@ycst.com

Counsel to the Future Claimants' Representative

EXHIBIT A-1

INVOICE FOR JULY 18, 2017 – SEPTEMBER 30, 2017

01:22401423.1

YOUNG CONAWAY STARGATT & TAYLOR, LLP

(302) 571-6600
(800) 253-2234 (DE ONLY)

RODNEY SQUARE
1000 NORTH KING STREET
WILMINGTON, DELAWARE 19801

(302) 571-1253 FAX
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P.O. Box 391
WILMINGTON, DELAWARE 19899-0391

TAX I.D. No. 51-0082644

TO:

10/12/2017
File No. 076321.1001

For Professional Services Rendered For:

Bill No. 40406967

**Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017**

Total Fees	\$ 14,681.00
Total Expenses	<u>51.70</u>
Total	\$ <u>14,732.70</u>

WHEN REMITTING PAYMENT, KINDLY REFERENCE FILE NO. 076321.1001 AND SEND TO THE ATTENTION
01:22446865.1 OF ACCOUNTING DEPT.

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

AGGREGATE TIME SUMMARY BY TASK CODE

TASK CODE	TASK DESCRIPTION	TOTAL HOURS	TOTAL AMOUNT
B001	Case Administration	0.70	257.50
B017	Retention of Professionals/Fee Issues	27.40	13,825.00
B018	Fee Application Preparation	2.10	598.50
Totals		30.20	\$ 14,681.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

ATTORNEY TIME SUMMARY BY TASK CODE

Task B001 Case Administration		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	0.50	x \$ 240.00	= 120.00
Edwin J. Harron	Partner	0.10	x \$ 820.00	= 82.00
Sara Beth A.R. Kohut	Counsel	0.10	x \$ 555.00	= 55.50
Totals:		0.70		\$ 257.50

Task B017 Retention of Professionals/Fee Issues		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	5.80	x \$ 240.00	= 1,392.00
Edwin J. Harron	Partner	2.70	x \$ 820.00	= 2,214.00
Lisa Eden	Paralegal	0.20	x \$ 240.00	= 48.00
Sara Beth A.R. Kohut	Counsel	0.50	x \$ 222.00	= 111.00
Sara Beth A.R. Kohut	Counsel	0.50	x \$ 333.00	= 166.50
Sara Beth A.R. Kohut	Counsel	17.20	x \$ 555.00	= 9,546.00
Sharon M. Zieg	Partner	0.50	x \$ 695.00	= 347.50
Totals:		27.40		\$ 13,825.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

Task B018		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Lisa Eden	Paralegal	1.80	x \$ 240.00 =	432.00
Sara Beth A.R. Kohut	Counsel	0.30	x \$ 555.00 =	166.50
	Totals:	2.10		\$ 598.50
	Aggregate Total:	30.20		\$ 14,681.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

		Total <u>Hours</u>	Hourly <u>Rate</u>	=	Total
EHARR	Edwin J. Harron, Partner	2.80	\$ 820.00	=	2,296.00
SZIEG	Sharon M. Zieg, Partner	0.50	\$ 695.00	=	347.50
SKOHU	Sara Beth A.R. Kohut, Counsel	17.60	\$ 555.00	=	9,768.00
SKOHU	Sara Beth A.R. Kohut, Counsel	0.50	\$ 333.00	=	166.50
CCATH	Casey Cathcart, Paralegal	6.30	\$ 240.00	=	1,512.00
LEDEN	Lisa Eden, Paralegal	2.00	\$ 240.00	=	480.00
SKOHU	Sara Beth A.R. Kohut, Counsel	0.50	\$ 222.00	=	111.00
Total:		30.20		\$	14,681.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40406967

10-12-2017

TIME DETAIL GROUPED BY TASK CODE

Date	Description	Attorney	Task Code	Time
08/17/17	Download and circulate new pleadings	CCATH	B001	0.10
09/01/17	Download and circulate new pleadings	CCATH	B001	0.10
09/12/17	Call with K. Maclay re: case status	EHARR	B001	0.10
09/14/17	Download and circulate new pleadings	CCATH	B001	0.20
09/19/17	Email to J. Dayton re: case status	SKOHU	B001	0.10
09/25/17	Download and circulate new pleadings	CCATH	B001	0.10
Sub Total				0.70

Date	Description	Attorney	Task Code	Time
07/18/17	Call to L. Fitzpatrick, call from Caplin & Drysdale, and call to S. Kohut re: engagement motion and retention issues	EHARR	B017	0.40
07/18/17	Emails with E. Harron re: preparing retention documents	SKOHU	B017	0.10
07/18/17	Analyze Szekelyi declaration and committee counsel retention application	SKOHU	B017	0.50
07/19/17	Prepare YCST retention application	CCATH	B017	1.30
07/19/17	Work on preparing pro hac vice motion for E. Harron	CCATH	B017	0.50
07/19/17	Work on YCST retention application	SKOHU	B017	1.10
07/19/17	Review and revise draft YCST retention application	SKOHU	B017	0.40
07/19/17	Review and revise draft motion to appoint FCR	SKOHU	B017	0.50
07/19/17	Analyze N.D. Ohio local rules; emails with E. Harron re: potential Ohio counsel options	SKOHU	B017	0.50
07/19/17	Further review and revise draft YCST retention application	SKOHU	B017	0.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40406967

10-12-2017

Date	Description	Attorney	Task Code	Time
07/20/17	Work on preparing pro hac vice motion for E. Harron	CCATH	B017	0.20
07/20/17	Prepare Fitzpatrick declaration in support of appointment	CCATH	B017	0.90
07/20/17	Prepare notice and proposed order to Fitzpatrick appointment motion	CCATH	B017	0.80
07/20/17	Review draft YCST and Fitzpatrick retention applications and provide comments to same	EHARR	B017	0.50
07/20/17	Continue to review and revise FCR and YCST retention papers	SKOHU	B017	0.80
07/21/17	Correspondence with L. Fitzpatrick re: FCR retention papers	SKOHU	B017	0.10
07/21/17	Review and revise FCR and YCST retention papers	SKOHU	B017	0.80
07/25/17	Correspondence with E. Harron and TAC counsel re: FCR retention papers (.1); research Ohio counsel options (.1)	SKOHU	B017	0.50
07/31/17	Email from L. Fitzpatrick re: FCR retention disclosures	SKOHU	B017	0.10
08/04/17	Review and revise FCR retention papers per comments of Debtor and ACC (1.3); multiple emails with K. Davis, E. Harron and L. Fitzpatrick re: status and strategy for same (.5)	SKOHU	B017	1.80
08/04/17	Emails with K. Davis and E. Harron re: FCR retention papers	SKOHU	B017	0.10
08/05/17	Edit FCR appointment papers	EHARR	B017	0.30
08/06/17	Emails with E. Harron re: strategy for FCR appointment and counsel retention; analyze disclosures needed for same	SKOHU	B017	0.30
08/07/17	Emails with E. Harron re: strategy for FCR retention disclosures	SKOHU	B017	0.10

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40406967

10-12-2017

Date	Description	Attorney	Task Code	Time
08/07/17	Review and revise FCR declaration and retention papers (.7); multiple correspondence with L. Fitzpatrick and E. Harron re: same (.1); email to K. Davis re: revisions to same (.1)	SKOHU	B017	0.90
08/07/17	Review and revise YCST retention application; emails with E. Harron re: same	SKOHU	B017	0.40
08/09/17	Confer with S. Kohut and D. Laskin re: filing logistics and timing	CCATH	B017	0.20
08/09/17	Correspondence with K. Davis re: Fitzpatrick declaration for FCR appointment motion; review and revise Fitzpatrick declaration; correspondence with L. Fitzpatrick re: same	SKOHU	B017	0.50
08/09/17	Finalize Fitzpatrick declaration for motion to appoint FCR; correspondence with K. Davis re: same	SKOHU	B017	0.30
08/11/17	Confer with S. Kohut re: filing status of FCR motion	CCATH	B017	0.10
08/11/17	Email with E. Harron re: timing for retention application	SKOHU	B017	0.10
08/14/17	Emails with E. Harron re: status of FCR appointment motion and potential Ohio counsel	SKOHU	B017	0.20
08/15/17	Correspondence with K. Davis re: status of FCR appointment motion	SKOHU	B017	0.20
08/16/17	Confer with S. Kohut re: FCR motion papers	CCATH	B017	0.10
08/16/17	Respond to U.S. Trustee issues re: terms of FCR order	EHARR	B017	0.20
08/16/17	Research re: Ohio counsel options	SKOHU	B017	0.10
08/16/17	Meet with E. Harron re: Ohio counsel; call to potential counsel re: same	SKOHU	B017	0.20
08/16/17	Email to K. Davis re: retention of Ohio counsel	SKOHU	B017	0.10
08/16/17	Prepare responses to U.S. Trustee comments on proposed FCR appointment papers; emails with E. Harron and L. Fitzpatrick re: strategy for same	SKOHU	B017	0.80

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40406967

10-12-2017

Date	Description	Attorney	Task Code	Time
08/17/17	Follow-up emails re: U.S. Trustee questions to FCR application	EHARR	B017	0.10
08/17/17	Emails with L. Fitzpatrick, E. Harron, and K. Maclay re: responses to comments of U.S. Trustee; finalize responses to same	SKOHU	B017	0.50
08/18/17	Research re: fee application procedures	CCATH	B017	0.30
08/18/17	Review motion filed to appoint FCR	SKOHU	B017	0.20
08/18/17	Emails with C. Cathcart re: compensation procedures order	SKOHU	B017	0.10
08/21/17	Emails with K. Maclay and with client re: U.S. Trustee's edits to FCR retention motion	EHARR	B017	0.30
08/21/17	Email to L. Fitzpatrick re: FCR insurance	EHARR	B017	0.10
08/22/17	Correspondence with C. Cathcart re: information related to L. Fitzpatrick's E&O policy	SZIEG	B017	0.10
08/28/17	Correspondence with E. Harron re: status of Ohio counsel retention	SKOHU	B017	0.10
08/28/17	Correspondence to E. Harron re: status of L. Fitzpatrick's E&O policy	SZIEG	B017	0.10
08/29/17	Correspondence with E. Harron re: Ohio counsel options	SKOHU	B017	0.20
08/30/17	Meet with E. Harron re: Ohio counsel options; telephone calls re: same	SKOHU	B017	0.20
08/30/17	Email to L. Fitzpatrick re: status of Ohio counsel retention	SKOHU	B017	0.10
08/31/17	Review and revise YCST retention application; email to J. Dayton re: same	SKOHU	B017	0.40
09/08/17	Update E. Harron's pro hac vice motion, prepare S. Kohut's pro hac vice motion, and update YCST's retention application	CCATH	B017	0.60
09/08/17	Analyze correspondence from J. Dayton re: retention applications and compensation procedures	SKOHU	B017	0.20

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40406967

10-12-2017

Date	Description	Attorney	Task Code	Time
09/11/17	Edit YCST retention papers (.3) and review edits to Ohio FCR counsel application (.3)	EHARR	B017	0.60
09/11/17	Correspondence from J. Dayton re: Ohio counsel retention	SKOHU	B017	0.10
09/11/17	Analyze, review and revise draft retention application for Black McCuskey (.6); review and revise draft retention application for YCST (.6)	SKOHU	B017	1.20
09/11/17	Multiple emails with E. Harron and L. Fitzpatrick re: retention applications for YCST and Black McCuskey	SKOHU	B017	0.30
09/12/17	Email to J. Dayton re: YCST and BMSA retention applications	SKOHU	B017	0.40
09/12/17	Emails with E. Harron and J. Dayton re: FCR appointment and timing to file YCST and BMSA retention applications	SKOHU	B017	0.20
09/13/17	Research for YCST retention application	CCATH	B017	0.20
09/13/17	Emails re: FCR order and potential need for correction	EHARR	B017	0.20
09/13/17	Emails with J. Dayton, E. Harron, and C. Cathcart re: FCR appointment order and retention apps of YCST and BMSA	SKOHU	B017	0.20
09/13/17	Analyze proposed FCR appointment order against entered order (.3); analyze strategy for correcting entered order (.2); emails with E. Harron re: same (.2); multiple correspondence with J. Dayton re: correction of FCR appointment order	SKOHU	B017	1.30
09/13/17	Correspondence with L. Fitzpatrick and E. Harron re: FCR retention related issues (.1); correspondence with J. Bolan and C. Cathcart re: same (.2)	SZIEG	B017	0.30
09/14/17	Revise FCR appointment order per S. Kohut's instructions	CCATH	B017	0.20
09/14/17	Multiple correspondence with J. Dayton and E. Harron re: strategy for correcting FCR appointment order	SKOHU	B017	0.40

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40406967

10-12-2017

Date	Description	Attorney	Task Code	Time
09/18/17	Analyze proposed revised FCR appointment order; email to J. Dayton re: same	SKOHU	B017	0.10
09/19/17	Attend to issues re: FCR's insurance	CCATH	B017	0.20
09/20/17	Confer with J. Forbes re: fee application procedures	CCATH	B017	0.10
09/21/17	Attend to issues re: FCR's insurance	CCATH	B017	0.10
09/28/17	Review interim compensation order	LEDEN	B017	0.20
Sub Total				27.40

Date	Description	Attorney	Task Code	Time
09/19/17	Review and revise YCST fee statement for July and August 2017	SKOHU	B018	0.30
09/28/17	Draft template re: interim fee applications of YCST	LEDEN	B018	1.80

EXHIBIT A-2

INVOICE FOR OCTOBER 1, 2017 – OCTOBER 31, 2017

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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P.O. Box 391
WILMINGTON, DELAWARE 19899-0391

TAX I.D. No. 51-0082644

TO:

11/16/2017
File No. 076321.1001

For Professional Services Rendered For:

Bill No. 40407836

**Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017**

Total Fees	\$	6,895.50
Total Expenses		<u>34.66</u>
Total	\$	<u>6,930.16</u>

WHEN REMITTING PAYMENT, KINDLY REFERENCE FILE NO. **076321.1001** AND SEND TO THE ATTENTION OF **ACCOUNTING DEPT.**

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

AGGREGATE TIME SUMMARY BY TASK CODE

TASK CODE	TASK DESCRIPTION	TOTAL HOURS	TOTAL AMOUNT
B001	Case Administration	0.70	298.00
B011	Other Adversary Proceedings	2.20	1,189.50
B012	Plan and Disclosure Statement	0.20	164.00
B016	Asset Analysis	8.90	4,338.50
B017	Retention of Professionals/Fee Issues	2.40	905.50
	Totals	14.40	\$ 6,895.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

ATTORNEY TIME SUMMARY BY TASK CODE

Task B001 Case Administration		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	0.20	x \$ 240.00	= 48.00
Edwin J. Harron	Partner	0.10	x \$ 820.00	= 82.00
Jordan E. Sazant	Associate	0.20	x \$ 285.00	= 57.00
Sara Beth A.R. Kohut	Counsel	0.20	x \$ 555.00	= 111.00
Totals:		0.70		\$ 298.00

Task B011 Other Adversary Proceedings		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	0.10	x \$ 240.00	= 24.00
Sara Beth A.R. Kohut	Counsel	2.10	x \$ 555.00	= 1,165.50
Totals:		2.20		\$ 1,189.50

Task B012 Plan and Disclosure Statement		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Edwin J. Harron	Partner	0.20	x \$ 820.00	= 164.00
Totals:		0.20		\$ 164.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

Task B016 Asset Analysis		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Edwin J. Harron	Partner	1.40	x \$ 820.00 =	1,148.00
Jordan E. Sazant	Associate	3.60	x \$ 285.00 =	1,026.00
Sara Beth A.R. Kohut	Counsel	3.90	x \$ 555.00 =	2,164.50
Totals:		8.90		\$ 4,338.50
Task B017 Retention of Professionals/Fee Issues		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	1.70	x \$ 240.00 =	408.00
Edwin J. Harron	Partner	0.20	x \$ 820.00 =	164.00
Sara Beth A.R. Kohut	Counsel	0.10	x \$ 555.00 =	55.50
Sharon M. Zieg	Partner	0.40	x \$ 695.00 =	278.00
Totals:		2.40		\$ 905.50
Aggregate Total:		14.40		\$ 6,895.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

		Total <u>Hours</u>	Hourly <u>Rate</u>	=	Total
EHARR	Edwin J. Harron, Partner	1.90	\$ 820.00	=	1,558.00
SZIEG	Sharon M. Zieg, Partner	0.40	\$ 695.00	=	278.00
SKOHU	Sara Beth A.R. Kohut, Counsel	6.30	\$ 555.00	=	3,496.50
JSAZA	Jordan E. Sazant, Associate	3.80	\$ 285.00	=	1,083.00
CCATH	Casey Cathcart, Paralegal	2.00	\$ 240.00	=	480.00
Total:		14.40		\$	6,895.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40407836

11-16-2017

TIME DETAIL GROUPED BY TASK CODE

Date	Description	Attorney	Task Code	Time
10/05/17	Download and circulate new pleadings	CCATH	B001	0.10
10/12/17	Call with L. Fitzpatrick re: case status	EHARR	B001	0.10
10/12/17	Telephone call with K. Davis re: meeting to discuss case strategy and due diligence	SKOHU	B001	0.10
10/12/17	Email to E. Harron re: due diligence strategy	SKOHU	B001	0.10
10/17/17	Emails with S. Kohut (x3) re: insurance settlement agreement review	JSAZA	B001	0.10
10/18/17	Emails (x2) with S. Kohut re: indemnity provision	JSAZA	B001	0.10
10/24/17	Download and circulate new pleadings	CCATH	B001	0.10
Sub Total				0.70

Date	Description	Attorney	Task Code	Time
10/27/17	Analyze correspondence from K. Davis re: protective order and motion to add FCR to same; email to L. Fitzpatrick and E. Harron re: same; draft confidentiality acknowledgement	SKOHU	B011	1.10
10/30/17	Obtain protective orders for S. Kohut	CCATH	B011	0.10
10/30/17	Analyze comments from J. Dayton re: motion to amend protective order and amended protective order (.1); review and revise markup of same (.6); revise letter to Debtor's counsel re: protective order (.1); email to L. Fitzpatrick re: same (.1); correspondence to K. Davis re: same (.1)	SKOHU	B011	1.00
Sub Total				2.20

Date	Description	Attorney	Task Code	Time
10/23/17	Call with K. Maclay re: plan negotiation (.1); call to client re: case status (.1)	EHARR	B012	0.20

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40407836

11-16-2017

Date	Description	Attorney	Task Code	Time
		Sub Total		
Date	Description	Attorney	Task Code	Time
10/04/17	Emails with K. Quinn and E. Harron re: insurance analysis	SKOHU	B016	0.10
10/09/17	Call with S.B. Kohut and K. Quinn re: insurance overview	EHARR	B016	0.40
10/09/17	Telephone call with E. Harron, K. Quinn and D. Wolf re: insurance asset analysis and case strategy; analyze materials from K. Quinn re: same	SKOHU	B016	0.40
10/09/17	Draft correspondence to L. Fitzpatrick re: analysis of insurance assets and strategy for same	SKOHU	B016	0.50
10/12/17	Analyze draft insurance settlement agreement and draft QSF motion	SKOHU	B016	1.00
10/17/17	Meet with S. Kohut re: settlement agreement review and comparison assignment	JSAZA	B016	0.20
10/17/17	Correspondence with J. Sazant re: project to analyze proposed insurance settlements	SKOHU	B016	0.20
10/17/17	Correspondence with D. Wolf re: proposed insurance settlement; correspondence with L. Fitzpatrick re: same	SKOHU	B016	0.20
10/18/17	Review Hartford settlement and QSF motion	EHARR	B016	0.60
10/18/17	Review Hartford settlement agreement	JSAZA	B016	2.20
10/18/17	Review QSF motion	JSAZA	B016	1.10
10/18/17	Email to S. Kohut re: settlement agreement markup and QSF motion	JSAZA	B016	0.10
10/19/17	Review edits to Hartford settlement and QSF motion	EHARR	B016	0.40
10/19/17	Analyze J. Sazant comments on draft insurance settlement agreement; review and revise same and draft QSF motion	SKOHU	B016	0.80

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40407836

11-16-2017

Date	Description	Attorney	Task Code	Time
10/19/17	Further review and revise draft insurer settlement agreement and QSF motion	SKOHU	B016	0.50
10/19/17	Correspondence with E. Harron and Gilbert re: insurance settlement agreement and QSF motion	SKOHU	B016	0.20
Sub Total				8.90

Date	Description	Attorney	Task Code	Time
10/02/17	Email to J. Dayton re: retention status	SKOHU	B017	0.10
10/27/17	Attend to issues re: FCR's insurance	CCATH	B017	1.70
10/30/17	Review emails re: Fitzpatrick insurance	EHARR	B017	0.20
10/30/17	Review correspondence; draft correspondence re: L. Fitzpatrick insurance	SZIEG	B017	0.40
Sub Total				2.40

EXHIBIT A-3

INVOICE FOR NOVEMBER 1, 2017 – NOVEMBER 30, 2017

01:22401423.1

YOUNG CONAWAY STARGATT & TAYLOR, LLP

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TAX I.D. No. 51-0082644

TO:

12/19/2017
File No. 076321.1001

For Professional Services Rendered For:

Bill No. 40408581

**Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017**

Total Fees	\$	7,627.50
Total Expenses		<u>320.57</u>
Total	\$	<u>7,948.07</u>

WHEN REMITTING PAYMENT, KINDLY REFERENCE FILE NO. **076321.1001** AND SEND TO THE ATTENTION OF **ACCOUNTING DEPT.**

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

AGGREGATE TIME SUMMARY BY TASK CODE

TASK CODE	TASK DESCRIPTION	TOTAL HOURS	TOTAL AMOUNT
B001	Case Administration	0.50	120.00
B002	Court Hearings	1.00	704.00
B006	Use, Sale or Lease of Property (363 issues)	3.90	2,350.00
B012	Plan and Disclosure Statement	2.00	1,587.00
B017	Retention of Professionals/Fee Issues	2.00	861.50
B018	Fee Application Preparation	2.20	775.00
B019	Travel	1.50	1,230.00
Totals		13.10	\$ 7,627.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

ATTORNEY TIME SUMMARY BY TASK CODE

Task B001 Case Administration		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	0.30	x \$ 240.00	= 72.00
Lisa Eden	Paralegal	0.20	x \$ 240.00	= 48.00
	Totals:	0.50		\$ 120.00

Task B002 Court Hearings		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Casey Cathcart	Paralegal	0.20	x \$ 240.00	= 48.00
Edwin J. Harron	Partner	0.80	x \$ 820.00	= 656.00
	Totals:	1.00		\$ 704.00

Task B006 Use, Sale or Lease of Property (363 issues)		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Edwin J. Harron	Partner	0.70	x \$ 820.00	= 574.00
Sara Beth A.R. Kohut	Counsel	3.20	x \$ 555.00	= 1,776.00
	Totals:	3.90		\$ 2,350.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

Task B012 Plan and Disclosure Statement		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Edwin J. Harron	Partner	1.80	x \$ 820.00 =	1,476.00
Sara Beth A.R. Kohut	Counsel	0.20	x \$ 555.00 =	111.00
	Totals:	2.00		\$ 1,587.00

Task B017 Retention of Professionals/Fee Issues		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Lisa Eden	Paralegal	1.10	x \$ 240.00 =	264.00
Sara Beth A.R. Kohut	Counsel	0.20	x \$ 555.00 =	111.00
Sharon M. Zieg	Partner	0.70	x \$ 695.00 =	486.50
	Totals:	2.00		\$ 861.50

Task B018 Fee Application Preparation		<u>Total Hours</u>	<u>Hourly Rate</u>	<u>Total</u>
Edwin J. Harron	Partner	0.10	x \$ 820.00 =	82.00
Lisa Eden	Paralegal	1.50	x \$ 240.00 =	360.00
Sara Beth A.R. Kohut	Counsel	0.60	x \$ 555.00 =	333.00
	Totals:	2.20		\$ 775.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

Task B019		Total <u>Hours</u>	Hourly <u>Rate</u>	Total
Edwin J. Harron	Partner	1.50	x \$ 820.00 =	1,230.00
	Totals:	1.50		\$ 1,230.00
	Aggregate Total:	13.10		\$ 7,627.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

AGGREGATE TIME SUMMARY PAGE BY INDIVIDUAL

		Total <u>Hours</u>	Hourly <u>Rate</u>	=	Total
EHARR	Edwin J. Harron, Partner	4.90	\$ 820.00	=	4,018.00
SZIEG	Sharon M. Zieg, Partner	0.70	\$ 695.00	=	486.50
SKOHU	Sara Beth A.R. Kohut, Counsel	4.20	\$ 555.00	=	2,331.00
CCATH	Casey Cathcart, Paralegal	0.50	\$ 240.00	=	120.00
LEDEN	Lisa Eden, Paralegal	2.80	\$ 240.00	=	672.00
Total:		13.10		\$	7,627.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40408581

12-19-2017

TIME DETAIL GROUPED BY TASK CODE

Date	Description	Attorney	Task Code	Time	Fees
11/14/17	Download and circulate new pleadings	CCATH	B001	0.10	24.00
11/21/17	Download and circulate new pleadings	CCATH	B001	0.10	24.00
11/22/17	Download and circulate new pleadings	CCATH	B001	0.10	24.00
11/28/17	Update critical dates	LEDEN	B001	0.20	48.00
	Sub Total			0.50	120.00

Date	Description	Attorney	Task Code	Time	Fees
11/03/17	Call to court re: E. Harron's telephonic appearance at 11/7/17 hearing	CCATH	B002	0.10	24.00
11/06/17	Follow-up call to court re: E. Harron's telephonic appearance at 11/7/17 hearing	CCATH	B002	0.10	24.00
11/07/17	Attend telephonic hearing/status conference	EHARR	B002	0.80	656.00
Sub Total				1.00	704.00

Date	Description	Attorney	Task Code	Time	Fees
11/08/17	Analyze draft motion to approve insurance settlement	SKOHU	B006	0.70	388.50
11/09/17	Review edits to Hartford settlement motion	EHARR	B006	0.10	82.00
11/09/17	Emails with E. Harron and L. Fitzpatrick re: draft motion to approve Hartford settlement	SKOHU	B006	0.10	55.50
11/10/17	Emails with L. Fitzpatrick and D. Wolf re: draft motion to approve settlement	SKOHU	B006	0.20	111.00
11/12/17	Analyze revisions to insurance settlement agreement and proposed order; research proposed QSF administrator	SKOHU	B006	0.40	222.00
11/15/17	Email to L. Fitzpatrick re: QSF administrator	SKOHU	B006	0.10	55.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40408581

12-19-2017

Date	Description	Attorney	Task Code	Time	Fees
11/16/17	Emails with D. Wolf re: insurance settlement approval	SKOHU	B006	0.20	111.00
11/17/17	Analyze proposed notices of insurance settlements and correspondence re: QSF fund; email to L. Fitzpatrick re: same	SKOHU	B006	0.20	111.00
11/20/17	Review edits to Hartford motion	EHARR	B006	0.10	82.00
11/20/17	Analyze revised motion to approve Hartford settlement and FCR consent request for same	SKOHU	B006	0.50	277.50
11/20/17	Telephone to D. Wolf re: QSF motion and motion to approve Hartford settlement	SKOHU	B006	0.10	55.50
11/20/17	Emails with L. Fitzpatrick and D. Wolf re: motions to approve Hartford settlement and QSF fund	SKOHU	B006	0.20	111.00
11/21/17	Calls and emails with committee counsel, debtor counsel, special insurance counsel, and J. Dayton re: Hartford motion for arbitration and Hartford settlement	EHARR	B006	0.30	246.00
11/21/17	Multiple mails and teleconference with K. Quinn and counsel for Debtor and TAC re: Hartford settlement status and strategy	SKOHU	B006	0.50	277.50
11/28/17	Emails and call re: Hartford	EHARR	B006	0.20	164.00
Sub Total				3.90	2,350.00

Date	Description	Attorney	Task Code	Time	Fees
11/02/17	Meet with client re: preparation for meeting with committee re: case status and plan strategy	EHARR	B012	0.30	246.00
11/02/17	Meet with committee and client re: case status and plan strategy	EHARR	B012	1.50	1,230.00
11/08/17	Confer with E. Harron re: status and strategy for due diligence and insurance settlement motion	SKOHU	B012	0.10	55.50

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative

File No. 076321.1001

Invoice No. 40408581

12-19-2017

Date	Description	Attorney	Task Code	Time	Fees
11/09/17	Emails with counsel for Debtor and TAC re: motion to amend protective order	SKOHU	B012	0.10	55.50
Sub Total				2.00	1,587.00

Date	Description	Attorney	Task Code	Time	Fees
11/03/17	Correspondence with J. Bolan re: E&O policy premium	SZIEG	B017	0.30	208.50
11/06/17	Address issues re: L. Fitzpatrick's E&O policies and U.S. Trustee's inquiries related to same	SZIEG	B017	0.40	278.00
11/26/17	Analyze to finalize fee applications for L. Fitzpatrick and YCST	SKOHU	B017	0.10	55.50
11/28/17	Email to/from L. Fitzpatrick re: first interim fee statement of for the period July-November 2017	LEDEN	B017	0.10	24.00
11/29/17	Analyze for privilege L. Fitzpatrick fee statement from 7/18/17 through 11/2017	SKOHU	B017	0.10	55.50
11/30/17	Draft first interim fee application of L. Fitzpatrick for the period July-November 2017	LEDEN	B017	1.00	240.00
Sub Total				2.00	861.50

Date	Description	Attorney	Task Code	Time	Fees
11/13/17	Review, revise, and finalize YCST October fee statement re: fee application preparation	EHARR	B018	0.10	82.00
11/21/17	Update and revise draft of first interim fee statement of YCST; email same to S. Kohut	LEDEN	B018	1.00	240.00
11/27/17	Review and revise draft form on interim fee application of YCST; correspondence with E. Harron and L. Eden re: same	SKOHU	B018	0.60	333.00

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
File No. 076321.1001 Invoice No. 40408581

12-19-2017

Date	Description	Attorney	Task Code	Time	Fees
11/28/17	Review, update, and revise draft first interim fee statement of YCST for the period July-November 2017	LEDEN	B018	0.50	120.00
Sub Total					2.20 775.00

Date	Description	Attorney	Task Code	Time	Fees
11/02/17	Non-working travel (round trip) to Washington, DC re: meeting with committee (billed at 1/2 time)	EHARR	B019	1.50	1,230.00
Sub Total					1.50 1,230.00

EXHIBIT B

**CUMULATIVE SUMMARY OF INTERIM APPLICATIONS OF YOUNG
CONAWAY STARGATT & TAYLOR, LLP, FOR SERVICES RENDERED
AND REIMBURSEMENT OF EXPENSES AS COUNSEL TO FUTURE
CLAIMANTS' REPRESENTATIVE OF SEPCO CORPORATION
FOR THE PERIOD JULY 18, 2017 THROUGH NOVEMBER 30, 2017¹**

<u>Matter Number</u>	<u>Matter Description</u>	Total Hours for the Period 7/18/2017- 11/30/2017	Total Hours from the Petition Date	Total Fees for the Period 7/18/2017- 11/30/2017	Total Fees from the Petition Date
B001	Case Administration	1.90	1.90	\$675.50	\$675.50
B002	Court Hearings	1.00	1.00	\$704.00	\$704.00
B006	Use, Sale or Lease of Property (363 issues)	3.90	3.90	\$2,350.00	\$2,350.00
B011	Other Adversary Proceedings	2.20	2.20	\$1,189.50	\$1,189.50
B012	Plan and Disclosure Statement	2.20	2.20	\$1,751.00	\$1,751.00
B016	Asset Analysis	8.90	8.90	\$4,338.50	\$4,338.50
B017	Retention of Professionals / Fee Issues	31.80	31.80	\$15,592.00	\$15,592.00
B018	Fee Application Preparation	4.30	4.30	\$1,373.50	\$1,373.50
B019	Travel	1.50	1.50	\$1,230.00	\$1,230.00
TOTAL		57.70	57.70	\$29,204.00	\$29,204.00

¹ See Footnote 2.

CUMULATIVE EXPENSE SUMMARY

<u>Expense Category</u>	<u>Total Expenses for the Period</u> <u>7/18/2017-11/30/2017</u>	<u>Total Expenses from the Petition Date</u>
Air/Rail Travel	\$267.00	\$267.00
Car/Bus/Subway Travel	\$35.87	\$35.87
Certified Court Documents	\$0.00	\$0.00
Computerized Legal Research	\$0.00	\$0.00
Docket Retrieval/Search	\$47.50	\$47.50
Federal Express	\$15.26	\$15.26
Hotel/Lodging	\$0.00	\$0.00
Miscellaneous	\$0.00	\$0.00
Mileage	\$0.00	\$0.00
Parking	\$11.00	\$11.00
Postage	\$8.20	\$8.20
Reproduction Charges	\$22.10	\$22.10
Teleconference / Video Conference	\$0.00	\$0.00
Travel Meals	\$0.00	\$0.00
Working Meals	\$0.00	\$0.00
TOTAL	\$406.93	\$406.93

01:22401423.1

EXHIBIT C-1

EXPENSES FOR JULY 18, 2017 – SEPTEMBER 30, 2017

01:22401423.1

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through September 30, 2017

AGGREGATE ITEMIZED DISBURSEMENTS

Description	Amount
Reproduction Charges	20.40
Docket Retrieval / Search	31.30
Total Disbursements:	\$51.70

CONTROL: 854519

Young, Conaway, Stargatt and Taylor
 PROFORMA BILLING WORKSHEET
 FOR BILLING PROFORMA NUMBER 319933

Page 14 (14)
 RUN: 10/06/17
 TIME: 11:28:54

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

<u>UNBILLED EXPENSES</u>		MATTER: 076321.1001 Debtor: Sepco Corporation													
<u>DATE</u>	<u>EXPENSE CODE</u>	<u>INDEX NO.</u>	<u>CHECK #</u>	<u>INVOICE</u>	<u>ORIG</u>	<u>DESCRIPTION</u>	<u>RECORDED VALUE</u>	<u>BILLING VALUE</u>	<u>REVISED VALUE</u>	<u>STATUS</u>	<u>BNC</u>	<u>B/O</u>	<u>H</u>	<u>X</u>	<u>BNP</u>
07/19/17	S102		5186523		CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer		3.80	3.80		B					
07/20/17	S102		5186524		VENDOR NAME: CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer		1.30	1.30		B					
08/09/17	S001		5175951		VENDOR NAME: JFORBPhotocopy Charges		8.40	4.20		B					

CONTROL: 854519

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 319933

Page 15 (15)
RUN: 10/06/17
TIME: 11:28:55

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

<u>UNBILLED EXPENSES</u>		(Continued)						<u>STATUS</u>							
<u>DATE</u>	<u>EXPENSE CODE</u>	<u>INDEX NO.</u>	<u>CHECK #</u>	<u>INVOICE</u>	<u>ORIG</u>	<u>DESCRIPTION</u>	<u>RECORDED VALUE</u>	<u>BILLING VALUE</u>	<u>REVISED VALUE</u>	<u>CURRENT</u>	<u>BNC</u>	<u>B/0</u>	<u>H</u>	<u>X</u>	<u>BNP</u>
						Duplication BW 2019 Motions 0541									
08/11/17	S102	VENDOR NAME: 5201524				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.40	0.40		B					
08/15/17	S102	VENDOR NAME: 5201525				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.20	0.20		B					
08/16/17	S102	VENDOR NAME: 5201501				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.20	0.20		B					
08/17/17	S102	VENDOR NAME: 5201502				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	6.50	6.50		B					
08/18/17	S102	VENDOR NAME: 5201503				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	17.30	17.30		B					
08/22/17	S102	VENDOR NAME: 5201504				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	1.40	1.40		B					
08/23/17	S102	VENDOR NAME: 5201505				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.20	0.20		B					
08/31/17	S001	VENDOR NAME: 5186803				SKOHUPhotocopy Charges Duplication BW 0592	5.60	2.80		B					
09/11/17	S001	VENDOR NAME: 5190185				SKOHUPhotocopy Charges Duplication BW 0592	5.60	2.80		B					
09/11/17	S001	VENDOR NAME: 5190186				SKOHUPhotocopy Charges	4.40	2.20		B					

CONTROL: 854519

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 319933

Page 16 (16)
RUN: 10/06/17
TIME: 11:28:55

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSES (Continued)

DATE	EXPENSE CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION	RECORDED VALUE	BILLING VALUE	REVISED VALUE	STATUS			
										CURRENT	BNC	B/0	H
						Duplication BW 0592							
09/11/17	S001	5190187				SKOHUPhotocopy Charges Duplication BW 0592	4.40	2.20		B			
09/11/17	S001	5190188				JFORBPhotocopy Charges Duplication BW 0541	6.00	3.00		B			
09/11/17	S001	5190189				JFORBPhotocopy Charges Duplication BW 0541	4.40	2.20		B			
09/18/17	S001	5193329				SKOHUPhotocopy Charges Duplication BW 0592	1.00	0.50		B			
09/28/17	S001	5198903				LEDENPhotocopy Charges Duplication BW 0791	1.00	0.50		B			
						VENDOR NAME:							
						INCLUDED EXPENSES FOR MATTER: 076321.1001	72.10	51.70					
						EXCLUDED EXPENSES (Expenses on Hold)	0.00	0.00					
						EXPENSES AFTER CUTOFF DATE		13.40					

STATUS CODE LEGEND

B	Billable	H	Expense on Hold (Excluded)	NB	Non-Billable
BNC	Bill - No Charge	X	Excluded from Instruction	BNP	Expense will not show on Statement
B/0	Billable - reduce value to "0"				

EXPENSE CODE SUMMARY

EXPENSE CODE	DESCRIPTION	RECORDED VALUE	BILLING VALUE
S001	Photocopy Charges	40.80	20.40
S102	Docket Retrieval / Search	31.30	31.30
	EXPENSE TOTAL	72.10	51.70
		=====	=====
TOTAL EXPENSES FOR INSTRUCTION:	319933	72.10	51.70

EXHIBIT C-2

EXPENSES FOR OCTOBER 1, 2017 – OCTOBER 31, 2017

01:22401423.1

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through October 31, 2017

AGGREGATE ITEMIZED DISBURSEMENTS

Description	Amount
Reproduction Charges	8.20
Federal Express	15.26
Docket Retrieval / Search	11.20
Total Disbursements:	\$34.66

CONTROL: 864442

Young, Conaway, Stargatt and Taylor
 PROFORMA BILLING WORKSHEET
 FOR BILLING PROFORMA NUMBER 322937

Page 11 (11)
 RUN: 11/09/17
 TIME: 08:55:07

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

UNBILLED EXPENSE DETAILS THROUGH 10/31/2017														
UNBILLED EXPENSES		MATTER: 076321.1001		Debtor: Sepco Corporation		RECORDED	BILLING	REVISED	STATUS					
DATE	EXPENSE CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION	VALUE	VALUE	CURRENT	BNC	B/O	H	X	BNP
09/01/17	S102	5216140			CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer		0.60	0.60	B					
09/07/17	S102	VENDOR NAME: 5216141			CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer		0.20	0.20	B					
09/12/17	S102	VENDOR NAME: 5216142			CCATHDocket Retrieval		1.40	1.40	B					

CONTROL: 864442

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 322937

Page 12 (12)
RUN: 11/09/17
TIME: 08:55:08

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

<u>UNBILLED EXPENSES</u>		(Continued)						RECORDED VALUE	BILLING VALUE	REVISED VALUE	STATUS				
DATE	EXPENSE CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION	CURRENT				BNC	B/0	H	X	BNP
09/13/17	S102	5216143				/ Search - Payee: Pacer Service Center Pacer	1.20	1.20		B					
09/14/17	S102	5216144				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	6.70	6.70		B					
09/15/17	S102	5216145				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.20	0.20		B					
09/18/17	S102	5216146				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.60	0.60		B					
09/29/17	S102	5216147				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	0.30	0.30		B					
10/12/17	S001	5205861				SKOHUPhotocopy Charges Duplication BW 0592	3.00	1.50		B					
10/12/17	S001	5205862				PMOREphotocopy Charges Duplication BW 0572	5.80	2.90		B					
10/27/17	004	5218522 201865				CCATHFederal Express -- FEDERAL EXPRESS - JEFFREY C. TOOLE, ESQ. CLEVELAND, OH	15.26	15.26		B					
10/30/17	S001	5214115				VENDOR NAME: Federal Express Corporation SKOHUPhotocopy Charges Duplication BW 0592	3.00	1.50		B					
						VENDOR NAME:									

CONTROL: 864442

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 322937

Page 13 (13)
RUN: 11/09/17
TIME: 08:55:08

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

<u>UNBILLED EXPENSES</u>		(Continued)						<u>STATUS</u>							
DATE	EXPENSE CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION	RECORDED VALUE	BILLING VALUE	REVISED VALUE	CURRENT	BNC	B/0	H	X	BNP
10/30/17	S001	5214116				SKOHUPhotocopy Charges Duplication BW 0592	1.20	0.60		B					
			VENDOR NAME:												
10/30/17	S001	5214117				SKOHUPhotocopy Charges Duplication BW 0592	3.00	1.50		B					
			VENDOR NAME:												
10/30/17	S001SCN	5214118				PMOREScanning Charges 0572	0.20	0.10		B					
			VENDOR NAME:												
10/30/17	S001SCN	5214119				PMOREScanning Charges 0572	0.20	0.10		B					
			VENDOR NAME:												
INCLUDED EXPENSES FOR MATTER: 076321.1001							42.86	34.66							
EXCLUDED EXPENSES (Expenses on Hold)							0.00	0.00							
EXPENSES AFTER CUTOFF DATE								294.87							

STATUS CODE LEGEND

B Billable	H Expense on Hold (Excluded)	NB Non-Billable
BNC Bill - No Charge	X Excluded from Instruction	BNP Expense will not show on Statement
B/0 Billable - reduce value to "0"		

EXPENSE CODE SUMMARY

EXPENSE CODE	DESCRIPTION	RECORDED VALUE	BILLING VALUE
004	Federal Express	15.26	15.26
S001	Photocopy Charges	16.00	8.00
S001SCN	Scanning Charges	0.40	0.20
S102	Docket Retrieval / Search	11.20	11.20
EXPENSE TOTAL		42.86	34.66
		=====	=====
TOTAL EXPENSES FOR INSTRUCTION:	322937	42.86	34.66

BILL HISTORY

BILL NUMBER	DATE	FEES	BILLED EXPENSES	ON-ACCOUNT	CASH RECEIVED	LAST PAY DATE	RECEIVABLE WRITTEN-OFF	OUTSTANDING BALANCE
40406967	10/12/17	14,681.00	51.70	0.00	0.00			14,732.70

EXHIBIT C-3

EXPENSES FOR NOVEMBER 1, 2017 – NOVEMBER 30, 2017

01:22401423.1

YOUNG CONAWAY STARGATT & TAYLOR, LLP

Fitzpatrick, Lawrence, Futures Claimants Representative
Billing Period Through November 30, 2017

AGGREGATE ITEMIZED DISBURSEMENTS

Description	Amount
Reproduction Charges	1.70
Air/Rail Travel	267.00
Parking	11.00
Car/Bus/Subway Travel	35.87
Docket Retrieval / Search	5.00
Total Disbursements:	\$320.57

CONTROL: 868346

Young, Conaway, Stargatt and Taylor
 PROFORMA BILLING WORKSHEET
 FOR BILLING PROFORMA NUMBER 324658

Page 11 (11)
 RUN: 12/14/17
 TIME: 08:41:38

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

DATE	CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION	RECORDED VALUE	BILLING VALUE	REVISED VALUE	STATUS					
										CURRENT	BNC	B/0	H	X	BNP
10/02/17	S102	5230627			CCATH	Docket Retrieval / Search - Payee: Pacer Service Center Pacer	0.60	0.60		B					
10/05/17	S102	VENDOR NAME: 5230628			CCATH	Docket Retrieval / Search - Payee: Pacer Service Center Pacer	1.00	1.00		B					
10/18/17	S102	VENDOR NAME: 5230629			CCATH	Docket Retrieval	0.20	0.20		B					

CONTROL: 868346

Young, Conaway, Stargatt and Taylor
 PROFORMA BILLING WORKSHEET
 FOR BILLING PROFORMA NUMBER 324658

Page 12 (12)
 RUN: 12/14/17
 TIME: 08:42:01

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

<u>UNBILLED EXPENSES</u>		(Continued)				RECORDED VALUE	BILLING VALUE	REVISED VALUE	STATUS					
DATE	CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION			CURRENT	BNC	B/O	H	X	BNP
						/ Search - Payee: Pacer Service Center Pacer								
10/30/17	S102	5230630				CCATHDocket Retrieval / Search - Payee: Pacer Service Center Pacer	3.20	3.20		B				
11/08/17	027	5218409	90100531			EHARRAir/Rail Travel - Payee: Harron, Edwin J. * Train fare (round trip) for E. Harron to Washington, DC re: 11/2/17 meeting	267.00	267.00		B				
11/08/17	086	5218410	90100531			EHARRParking - Payee: Harron, Edwin J. * Parking for E. Harron at Wilmington train station re: 11/2/17 meeting in Washington, DC	11.00	11.00		B				
11/08/17	087	5218411	90100531			EHARRCar/Bus/Subway Travel - Payee: Harron, Edwin J. * Transportation for E. Harron in Washington, DC re: 11/2/17 meeting	16.87	16.87		B				
11/08/17	S001	5219478				SKOHUPhotocopy Charges Duplication BW 0592	2.20	1.10		B				
11/16/17	087	5222493	90100645			EHARRCar/Bus/Subway Travel - Payee: Harron, Edwin J. * Transportation for E. Harron and L. Fitzpatrick re: 11/2/17	19.00	19.00		B				

CONTROL: 868346

Young, Conaway, Stargatt and Taylor
PROFORMA BILLING WORKSHEET
FOR BILLING PROFORMA NUMBER 324658

Page 13 (13)
RUN: 12/14/17
TIME: 08:42:01

CLIENT: 076321 Fitzpatrick, Lawrence, Futures Claimants Represent MATTER: 076321.1001 Debtor: Sepco Corporation

<u>UNBILLED EXPENSES</u>		(Continued)					RECORDED VALUE	BILLING VALUE	REVISED VALUE	STATUS			
DATE	EXPENSE CODE	INDEX NO.	CHECK #	INVOICE	ORIG	DESCRIPTION	CURRENT	BNC	B/0	H	X	BNP	
meeting in Washington, DC													
11/22/17	S001SCN	5226066				VENDOR NAME: Harron, Edwin J. PMOREScanning Charges 0572	0.20	0.10		B			
11/22/17	S001SCN	5226067				VENDOR NAME: PMOREScanning Charges 0572	0.20	0.10		B			
11/30/17	S001SCN	5228901				VENDOR NAME: PMOREScanning Charges 0572	0.40	0.20		B			
11/30/17	S001SCN	5228902				VENDOR NAME: PMOREScanning Charges 0572	0.40	0.20		B			
VENDOR NAME:													
INCLUDED EXPENSES FOR MATTER: 076321.1001													
EXCLUDED EXPENSES (Expenses on Hold)													
EXPENSES AFTER CUTOFF DATE													
							322.27	320.57					
							0.00	0.00					
								15.30					

STATUS CODE LEGEND

B Billable	H Expense on Hold (Excluded)	NB Non-Billable
BNC Bill - No Charge	X Excluded from Instruction	BNP Expense will not show on Statement
B/0 Billable - reduce value to "0"		

EXPENSE CODE SUMMARY			
EXPENSE CODE	DESCRIPTION	RECORDED VALUE	BILLING VALUE
027	Air/Rail Travel	267.00	267.00
086	Parking	11.00	11.00
087	Car/Bus/Subway Travel	35.87	35.87
S001	Photocopy Charges	2.20	1.10
S001SCN	Scanning Charges	1.20	0.60
S102	Docket Retrieval / Search	5.00	5.00
EXPENSE TOTAL		322.27	320.57
===== =====			
TOTAL EXPENSES FOR INSTRUCTION:	324658	322.27	320.57

BILL HISTORY							
BILL NUMBER	DATE	FEES	BILLED EXPENSES	ON-ACCOUNT	CASH RECEIVED	LAST PAY DATE	RECEIVABLE WRITTEN-OFF
							OUTSTANDING BALANCE

EXHIBIT D

CERTIFICATION OF EDWIN J. HARRON

01:22401423.1

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION (Akron)**

In re:

SEPCO CORPORATION,

Debtor.¹

Chapter 11

Case No. 16-50058

Judge Alan M. Koschik

CERTIFICATION OF EDWIN J. HARRON

EDWIN J. HARRON does hereby certify as follows:

1. I am a partner of Young Conaway Stargatt & Taylor, LLP (the “Applicant”), counsel to Lawrence Fitzpatrick, the legal representative for future asbestos claimants.
2. I am a professional who has performed services in this case and I have responsibility for compliance with Local Rule 2016-1 and the Guidelines for Compensation and Expense Reimbursement of Professionals.
3. I was admitted *pro hac vice* to this Court on September 14, 2017 [D.I. 273].
4. I have read the foregoing Application and the information therein is true to the best of my knowledge, information, and belief.
5. The Applicant has received no promises for payment from any third party for services rendered in connection with the case for the Interim Period (commencing July 18, 2017 through November 30, 2017²). There exists no agreement or understanding between the Applicant and

¹ The last four digits of the Debtor’s federal tax identification number are 7402.

² The *Order Authorizing Retention and Employment of Young Conaway Stargatt & Taylor, LLP as Attorneys for the Future Claimants’ Representative* was entered on October 4, 2017 (see D.I. 287) but was *nunc pro tunc* to July 18, 2017. Since the deadline to file interim fee applications covering the period June 1, 2017 – August 31, 2017 was on or around September 20, 2017, this is the first interim application of Young Conaway Stargatt & Taylor (“YCST”). YCST’s next interim application will be filed in accordance with the *Agreed Order Granting Motion for an Administrative Order Authorizing and Establishing Procedures for Interim Payment of Compensation and Reimbursement of Expenses of Professionals Pursuant to Section 105(a) and 331 of the Bankruptcy Code* (the “Interim Compensation Order”) which was entered on September 2, 2016 (see D.I. 149) and will cover December 1, 2017 – February 28, 2018.

any other person for the sharing of any compensation to be received for services rendered by the Applicant in the case.

6. To the best of my knowledge, information, and belief, the compensation and expense reimbursement requested in the Application has been billed at the standard billing rates and in accordance with the practices customarily employed by the Applicant.

Dated: December 21, 2017

/s/ *Edwin J. Harron*

Edwin J. Harron